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REMARKS

Claims 1-61 are currently pending in the above-identified patent application. In the subject Office Action, the Examiner objected to claims 11-13 and 59-61 because the phrase "may be" is not a positive limitation. In response to the Examiner's objection, applicants have amended these claims to replace the phrase "may be" with "is." Claims 1, 29 and 34 were also amended to correct an obvious typographical omission. No new matter has been added by these changes.

Claims 1-9, 15, 17, 20-25, 28-36, 38, 40, 43-48, and 51-57 were rejected under 35 U.S.C. 102(b) as being anticipated by Srinivasan (U.S. Patent No. 5,724,412), since the Examiner stated that with regard to claims 1, 29-31 and 34, Srinivasan teaches a speech to text conversion system and method for converting voice information to text information for a specified user associated with a Caller ID comprising: a telephony device that transmits said voice information (Col. 3, lines 50-55); a telephone network that receives said voice information from said telephony device and transmits said voice information and said Caller ID to said communications server (See Fig. 1); a communications server that receives said voice information and said Caller ID; an account disposed in said communications server that is accessed by and linked to said Caller ID, said account including routing information that routes text information to a specified destination and having a speech recognition system configured specifically for said user that converts said voice information to said text information; a router disposed in said communications server that automatically transmits said text information to said specified destination (Col. 4, lines 3-26; Col. 5, lines 21-39). The Examiner continued that regarding claims 2, 32 and 35, Srinivasan teaches that said communications server further comprises a storage device that stores said voice information (Col. 5, lines 6-20); regarding claims 3, 33 and 36, Srinivasan teaches wherein said communications server further comprises a storage device that stores said text information (Col. 5, lines 6-20); regarding claims 4-9 and 52-57, Srinivasan teaches the claimed limitations (Col. 5, lines 31-34); regarding claims 15, 17, 20-25, 38, 40 and 43-48, Srinivasan teaches the claimed limitations (Col. 1, lines 50-55); and with regard to

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claims 28 and 51, Srinivasan teaches wherein said telephony device is a wireline telephony device (Col. 3, lines 50-55).

For the reasons to be set forth hereinbelow, applicants respectfully disagree with the Examiner concerning the rejection of claims 1-9, 15, 17, 20-25, 28-36, 38, 40, 43-48, and 51-57 under 35 U.S.C. 102(b) as being anticipated by Srinivasan.

Claims 10-13, 27, 50 and 58-61 were rejected under 35 U.S.C. 103(a) as being unpatentable over Srinivasan in view of Rabe et al. (U.S. Patent No. 5,764,730), since the Examiner stated concerning claims 10-13 and 58-61, that although Srinivasan does not suggest that the Caller ID is an Electronic Serial Number from a wireless telephony device and that the Caller ID is information stored within a Subscriber Identification Module which may be installed in a wireless telephony device, Rabe et al. suggests such structure (Col. 4, lines 1-52; Col. 6, lines 3-11), and that it would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate the teaching of Rabe et al. into Srinivasan in order to provide caller information from different networks. Concerning claims 27 and 50, the Examiner again asserted that Srinivasan does not suggest that the telephony device is a wireless telephony device, but that Rabe et al. suggests this structure in Fig. 3, and that it would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate the teachings of Rabe et al. into Srinivasan in order to provide caller information from different networks.

Applicants respectfully disagree with the Examiner concerning the rejection of claims 10-13, 27, 50 and 58-61 under 35 U.S.C. 103(a) as being unpatentable over Srinivasan in view of Rabe et al. for the reasons to be set forth hereinbelow. In particular, applicants believe that Srinivasan teaches away from the present claimed invention and therefore is not a proper reference under 35 U.S.C. 103(a) since there would be no motivation to combine Srinivasan with Rabe et al. for one having ordinary skill in the art at the time the invention was made. The Examiner also rejected claims 14 and 37, and 16, 18, 39, and 41 under 35 U.S.C. 103(a) as being unpatentable over Srinivasan in view of Minborg et al. (U.S. Patent No. 5,922,721), and over Srinivasan in view of Skog (U.S. Patent No. 5,930,701), respectively, and

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claims 19 and 42 and claims 26 and 49 under 35 U.S.C. 103(a) as being unpatentable over Srinivasan in view of Wu et al. (U.S. Patent No. 6,813,489), and over Srinivasan in view of Delaney et al. (U.S. Patent No. 6,842,772), respectively. As stated hereinabove concerning the rejection over Rabe et al. for the reasons to be set forth hereinbelow, applicants believe that Srinivasan teaches away from the present claimed invention, and therefore that there would be no motivation for one of ordinary skill in the art at the time the invention was made to combine Srinivasan with other references under 35 U.S.C. 103(a) as the Examiner has done. Thus, applicants respectfully believe that the Examiner has not made a proper *prima facie* case for obviousness as is required under 35 U.S.C. 103(a).

Turning now to subject claim 1 as an example, wherein it is recited in part that: "A speech to text conversion system for converting voice information to text information for a specified user associated with a Caller ID comprising: ... an account disposed in said communications server that is accessed by and linked to said Caller ID, said account including routing information that routes text information to a specified destination and having a speech recognition system configured specifically for said user that converts said voice information to said text information;"

By contrast, the Abstract of Srinivasan states: "A method and system for providing a telephony subscriber with Internet information related to a caller attempting to call the subscriber is disclosed. The Internet information is provided to the customer premises equipment of the subscriber during the first and second ring of a call. Subsequently, if the call is not completed, then the caller's Internet information is accessible at a later time, along with any corresponding voice mail associated with the call and any caller-ID information such as the caller's name and/or telephone number. Additionally, the present invention allows the subscriber to request that caller information corresponding to an incomplete call to the subscriber be presented to the caller's customer premises equipment in one of the forms: all text, all vocalized in speech or in a combination of text and vocalized speech." Further, in Col. 4, lines 21-26, of Srinivasan it is stated that: "Accordingly, the caller information manager 54 includes or is able to activate a text-to-voice

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converter 38 for translating at least Internet identification information for caller 1 into the desired presentation format(s) compatible with the customer premises equipment (CPE) 42 for callee 1.", and in Col. 8, beginning on line 49 and ending in Col. 9, lines 12 of Srinivasan it is stated that: "Referring now to the path of steps 412 through 424, these steps are preformed when the caller information manager 54 determines that the response to the callee is to be entirely audible (i.e. voice). Thus in step 412, the caller information manager 54 sends any text based caller-ID and Internet ID information (retrieved in steps 316 and 324 of FIG. 3) to the text-to-voice converter 38 for translation. Subsequently, upon receiving such a translation, the caller information manager 54 combines each output from the converter 38 with any corresponding voice mail thereby generating a voice message from transmission to the callee. Subsequently, in step 420, the caller information manager 54 outputs the generated message to the callee via the central office, wherein the message includes audible versions of any Internet ID information, any caller-ID information any caller voice mail. Subsequently, in step 424, the callee is able to listen to the voice message. The alternative paths succeeding step 408 are the 'leave as is' path and the 'all text' path. Both of these paths are similar to the sequence of steps 412 through 424. In particular, the 'leave as is' path of steps 428 through 436 creates a message wherein the message has a mixed format in that any voice mail will be designated as having an audio format whereas any caller-ID and Internet ID information will be designated as having a text format. Alternatively, in the path of steps 440 through 452, a description for generating a message having only text representation of caller-ID, Internet identification information and caller voice mail is provided analogously to steps 412 through 424 except that the voice-to-text converter 34 is utilized instead of the text-to-voice converter 38."

Thus, Srinivasan clearly teaches that it is the caller's identification information and voice message that may be converted into text information and not that of a specified user, as is required in subject claim 1. There is no teaching of a speech recognition system specifically configured for a specified user, since callers are likely to be unknown to the callee, and may even be random. See, for example, Col. 1, lines 33-45, of Srinivasan wherein it is stated that: "The present invention is

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a method and a system for providing a telephone user Internet information related to a caller attempting to call the user. In particular, the user, also known as the callee, upon requesting utilization of the present invention, can receive Internet identification information related to a caller from the callee's local telephony provider regardless of how the caller's call is transmitted. That is, the present invention makes such Internet identification information available to the caller regardless of whether some portion of the call is transmitted through the Internet or not. Moreover, such caller related Internet identification information can be presented to the callee prior to the callee's answering the call from the caller, or alternatively, if, for example, the callee is not available to receive the call, then the callee may retrieve such information at a later time. Thus, the present invention is useful for providing various types of Internet identification information depending upon the type of Internet communication capabilities the caller has. In particular, the Internet identification information may include one or more of the caller's e-mail address, the caller's Universal Resource Location (URL) identifier, a Gopher address, a Wide Area Information Server (WAIS) address and a file transport protocol (FTP) address." There is no teaching or suggestion that speech recognition information specific to the caller or the specified user is to be provided, as is recited in the subject claims. Similar arguments may be made for independent claims 29 and 34.

The Examiner also rejected claims 2-9, 15, 17, 20-25, 28, 30-33, 35, 36, 38, 40, 43-48, and 51-57 under 35 U.S.C. 102(b) as being anticipated by Srinivasan. Claims 2-9, 15, 17, 20-25 and 28, depend from independent claim 1, claims 30-33 depend from independent claim 29, and claims 35, 36, 38, 40, 43-48, and 51-57 depend from independent claim 34. As discussed hereinabove, applicants believe that independent claims 1, 29 and 34 are patentable over Srinivasan and combinations thereof with other references cited by the Examiner. Therefore, the claims that depend therefrom are similarly patentable.

Applicants believe that Srinivasan teaches away from the subject claimed invention, and clearly does not anticipate the present invention. As a result, as stated hereinabove, Srinivasan has been improperly combined with other references in an obviousness-type rejection under 35 U.S.C. 103(a).

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In view of the discussion presented hereinabove, applicants believe that subject claims 1-61, as amended, are in condition for allowance, and such action by the Examiner at an early date is earnestly solicited.

Reexamination and reconsideration are respectfully requested.

Respectfully submitted,

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